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10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 **JEREMY ANDERSON**, as guardian of the
person and estate of William Anderson;
14 **JEREMY ANDERSON**, (individually and as the
father of William Anderson); and **JULIANA**
15 **ANDERSON** (individually, and as the mother of
William Anderson,
16

17 Plaintiffs,

18 v.

19 **CLARK COUNTY SCHOOL DISTRICT**,
20 Defendant.

CASE NO. 2:24-cv-01514-CDS-EJY

STIPULATION AND ~~[PROPOSED]~~
ORDER TO MODIFY DISCOVERY
PLAN AND SCHEDULING ORDER

[FIRST REQUEST]

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The parties, Plaintiffs, Jeremy Anderson as guardian of the person and estate of William Anderson; Jeremy Anderson, individually and as the father of William Anderson; and Juliana Anderson, individually and as the mother of William Anderson (collectively “Plaintiffs”) and Defendants Clark County School District (“CCSD”), through their undersigned counsel, hereby make their first request to modify the stipulated discovery plan and scheduling order, as follows:

I. STATEMENT OF DISCOVERY COMPLETED

At the Court’s direction, the parties submitted their stipulated discovery plan and scheduling order on November 1, 2024 [ECF 10] and the Court entered its scheduling order on November 4, 2024 [ECF 11]. The parties have completed the following discovery to date:

1. On November 6, 2024, Plaintiffs served their initial disclosures.
2. On November 7, 2024, Defendants served their initial disclosures.
3. On November 26, 2024, Plaintiffs served their First Set of Interrogatories and First Set of Requests for Production of Documents by Plaintiffs to Defendant Clark County School District.
4. On December 16, 2024, Defendant served its First Set of Interrogatories and First Set of Requests for Production of Documents to Plaintiffs.

II. STATEMENT OF DISCOVERY THAT REMAINS TO BE COMPLETED

The following discovery remains to be completed:

1. Defendant to respond to Plaintiffs’ written discovery requests;
2. Plaintiffs to respond to Defendant’s written discovery requests;
3. Defendant to subpoena Plaintiffs’ Medical Records;
4. Complete Party Depositions;
5. Defendant to Complete Psychological Examination of Plaintiff William Anderson by CCSD’s expert;
6. Disclosure of Experts, Expert Reports; and
7. Complete Expert Discovery and Depositions.

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III. REASONS WHY DISCOVERY WILL NOT BE COMPLETED BY THE CURRENT DISCOVERY CUTOFF

Under the current deadlines, lay discovery closes on February 19, 2025. The parties have been negotiating the terms of a Confidentiality Order and are close to resolution; however, this has delayed completing written discovery. Further, the upcoming school holidays and counsels' schedules have delayed scheduling party depositions. Therefore, the parties require additional time to complete discovery.

IV. PROPOSED SCHEDULE

The parties hereby stipulate and agree that the deadlines to complete discovery as set forth in the Scheduling Order [ECF 11] shall be extended by sixty (60) days as follows:

1. **Lay Discovery Period:** The deadline to complete lay discovery shall be extended sixty-one (61) days, from February 19, 2025, to Monday, April 21, 2025 (the 60th day falls on Sunday, April 20 and is advanced to Monday, per Fed. R. Civ. P. 6(a)(1)(C)).

2. **Initial Expert Disclosure:** The deadline to file initial expert reports shall be extended from March 21, 2025, to Tuesday, May 20, 2025.

3. **Rebuttal Expert Disclosure:** The deadline to file rebuttal expert reports shall be extended from April 21, 2025, to Friday, June 20, 2025.

4. **Expert Discovery Period:** The deadline to complete expert discovery shall be extended sixty-one (61) days, from May 21, 2025, to Monday, July 20, 2025 (the 60th day falls on Sunday, July 19 and is advanced to Monday, per Fed. R. Civ. P. 6(a)(1)(C)).

5. **Dispositive Motions:** The deadline to file dispositive motions shall be extended from June 20, 2025, to Tuesday, August 19, 2025.

6. **Pretrial Order:** If no dispositive motions are filed, the Joint Pretrial Order shall be filed thirty (30) days after the date for filing the dispositive motions. Therefore, the joint pretrial order shall be extended from July 21, 2025, to Friday, September 19, 2025. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the decision on the dispositive motions or by further order of the court.

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This stipulation and order is sought in good faith and not for the purposes of delay. This is the first request for a scheduling extension.

IT IS SO STIPULATED.

DATED this 20TH day of December 2024.

DATED this 20TH day of December 2024.

**WOLF, RIFKIND, SHAPIRO,
SCHULMAN & RABKIN, LLP**

GREENBERG TRAURIG, LLP

/s/ Douglas Cohen

/s/ Whitney Welch-Kirmse

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Counsel for Plaintiffs

***Counsel for Defendant,
Clark County School District***

ORDER

In consideration of the stipulation by the parties, and with good cause appearing,

1. **Lay Discovery Period:** The deadline to complete lay discovery shall be extended from February 19, 2025, to Monday, April 21, 2025.

2. **Initial Expert Disclosure:** The deadline to file initial expert reports shall be extended from March 21, 2025, to Tuesday, May 20, 2025.

3. **Rebuttal Expert Disclosure:** The deadline to file rebuttal expert reports shall be extended from April 21, 2025, to Friday, June 20, 2025.

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6. **Pretrial Order:** If no dispositive motions are filed, the Joint Pretrial Order shall be filed thirty (30) days after the date for filing the dispositive motions. Therefore, the joint pretrial

1 order shall be extended from July 21, 2025, to Friday, September 19, 2025. In the event dispositive
2 motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30)
3 days after the decision on the dispositive motions or by further order of the court.

4 **IT IS SO ORDERED.**

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6 UNITED STATES MAGISTRATE JUDGE

7 DATED: December 20, 2024
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